

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON; et al.,**

Plaintiffs,

vs.

ANA MARI CAUCE, in her official capacity
as president of the University of
Washington; et al.,

Defendants.

CASE NO. C18-189-MJP

**DECLARATION OF CHEVY
SWANSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION;
EXHIBITS**

Note On Mot. Cal.: March 30, 2018

Judge: Hon. Marsha J. Pechman
Date: April 17, 2018
Time: 10:00 a.m.
Crtrm.: Suite 14206, United States
Courthouse, 700 Stewart
Street, Seattle, WA 98101-
9906

I, Chevy Swanson, declare as follows:

1. I am a Plaintiff in this lawsuit, a resident of Seattle, Washington, and president of the plaintiff College Republicans ("College Republicans") of the University of Washington. The following facts and circumstances are personally known to me, and if called upon to do so, I could and would competently testify as to them.

2. This declaration is presented in support of Plaintiffs' Motion for Preliminary Injunction.

3. On January 20, 2018, as president of the College Republicans, and as part of our outreach efforts, I was in Red Square where I helped set up an informational table for our club. Members of the Industrial Workers of the World were several hundred feet away in the square shouting and giving speeches. At some point, some of them pointed and shouted at us, calling us names. We stayed at our table the whole time. A few people took photos and videos of us but did nothing physically threatening. There were at least 10 police officers present but they did not have to protect us because no one was threatening us. I have read the Declaration of Chief Vinson where he inaccurately describes the situation and tries to portray my group as inciting violence. We were minding out business doing what we do on campus. A sign at our table said: "Speech isn't violence. Change my mind." It is an effort to engage people in civil dialogue concerning a principle we feel many people don't seem to get. Here's a picture of us that day:



1 That's me on the left. Do we look dangerous?

2 4. On February 10, 2018, as the organizer of the Freedom Rally, I was present in
3 Red Square in an area designated by UW for our event on the north side of the square. I
4 estimated approximately 50 to 75 people who attended our rally. On the other side of the square
5 there were hundreds and hundreds of protesters who showed up uninvited. Many of them wore
6 masks and black clothing to conceal their identities. I have read the Declaration of Christopher
7 Jaross where he singles out an individual associated with Patriot Prayer for entering the protest
8 area. But he fails to describe the entire situation and in a video accessible to the public I can
9 identify the individual as Tiny. See <https://www.youtube.com/watch?v=oEm-QXEFujw>. As
10 the video clearly shows, Tiny was indeed in the protest area, but he wasn't assaulting people;
11 people were assaulting him (between the 3-4 minute mark). As the entire video shows, there
12 were other skirmishes as well that Lt. Jaross fails to mention in his declaration. Attached hereto
13 and incorporated herein by reference as Exhibit 1 is a true and correct copy of screenshots I
14 took of Tiny and the crowd size.
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17 I declare under penalty of perjury under the laws of the State of Washington that
18 the foregoing is true and correct.

19 DATED this 2nd day of April, 2018, at Los Angeles, California.

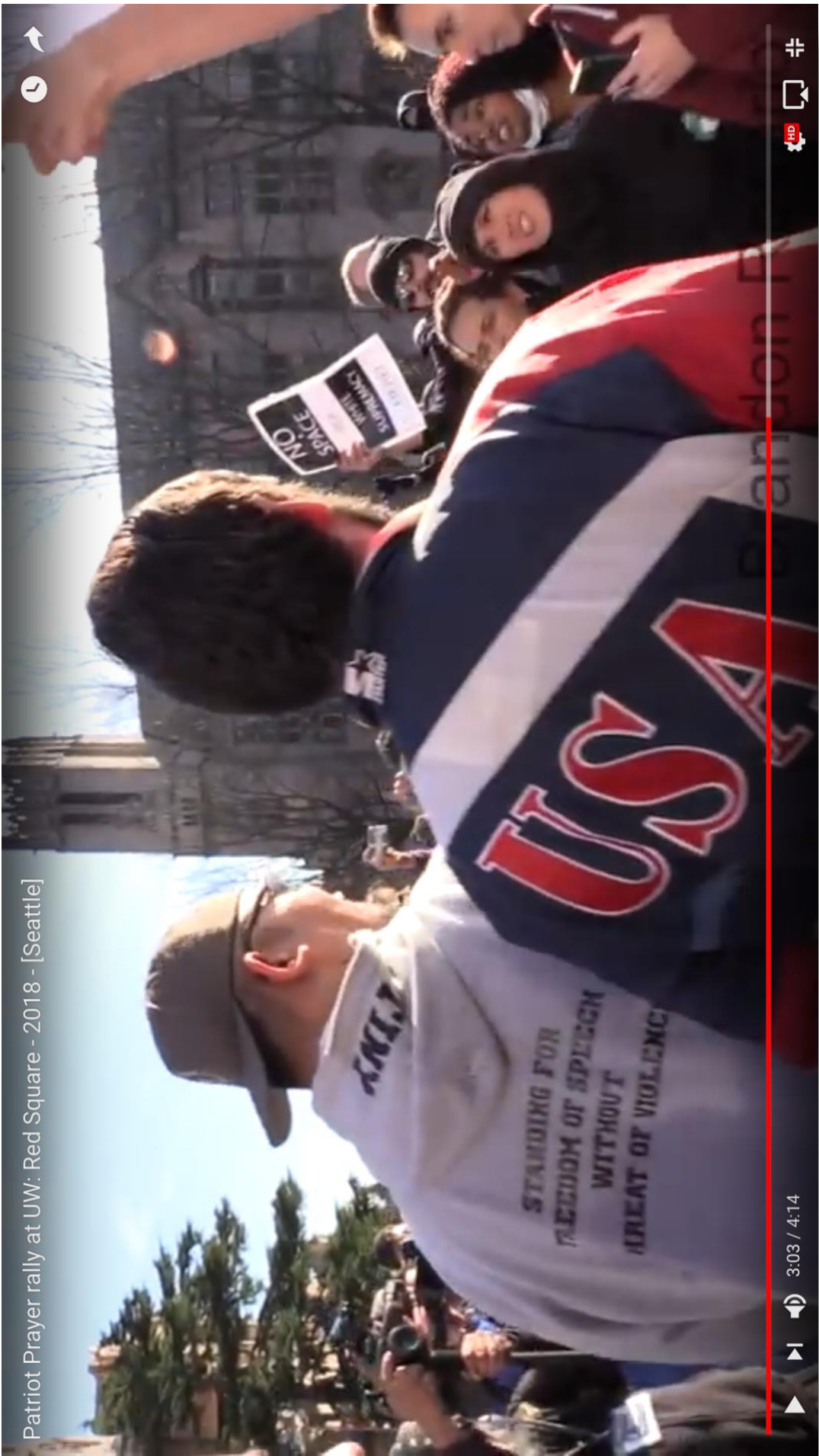


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21
22 CHEVY SWANSON

1 I hereby certify that on this 2nd day of April, 2018, I electronically filed the
2 foregoing document with the Clerk of the United States District Court using the CM/ECF
3 system which will send notification of such filing to all parties who are registered with the
4 CMECF system.
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6 DATED this 2nd day of April, 2018

7 By: /s/ William J. Becker, Jr.
8 William J. Becker, Jr. (Pro Hac Vice)
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Tiny wearing gray hoodie that says:
“Standing for Freedom of Speech without Threat of Violence”